IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA ATHENS DIVISION

UNITED STATES OF AMERICA, : CRIMINAL NO. 3:22-CR- 12 (CAR)

vs.

: VIOLATIONS: 18 U.S.C. § 1951

AHKIL NASIR CRUMPTON, a/k/a "CRUMP," : 18 U.S.C. § 924(c)
JAMES ARMSTRONG, : 18 U.S.C. § 924(j)

18 U.S.C. § 924(j)(1) 18 U.S.C. § 922(a)(6) 18 U.S.C. § 924(a)(2)

Defendants. : 18 U.S.C. § 2

THE GRAND JURY CHARGES:

COUNT ONE

(Interference with Commerce by Attempted Robbery)

That at all times material to this Indictment, RaceTrac was a business and company engaged in commercial retail sales of goods and products, in interstate and foreign commerce, and in an industry which affects interstate and foreign commerce.

That on or about March 19, 2021, in the Athens Division of the Middle District of Georgia,

AHKIL NASIR CRUMPTON, a/k/a "CRUMP,"

defendant herein, did knowingly and intentionally attempt to take United States currency from, and in the presence of, Elijah Wood, an employee of RaceTrac, located at 7921 Macon Highway, Watkinsville, Georgia, against the will of said person, by means of actual and threatened force, violence and fear of injury, immediate and future, to said person, that is, by brandishing and discharging a firearm inside the RaceTrac store at a time when Elijah Wood was working and standing behind the counter; all in violation of Title 18, United States Code, Section 1951.

COUNT TWO

(Use and Discharge of a Firearm in Furtherance of a Crime of Violence)

That on or about March 19, 2021, in the Athens Division of the Middle District of Georgia,

AHKIL NASIR CRUMPTON, a/k/a "CRUMP,"

defendant herein, knowingly carried, possessed, used, brandished, and discharged a firearm, that is, a Glock 9mm caliber pistol, Model: 19, Serial Number: BPDV410, during and in relation to, and in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, that is, the crime alleged in Count One of this Indictment, which is realleged and incorporated by reference herein; all in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE

(Murder with a Firearm During a Crime of Violence)

That on or about March 19, 2021, in the Athens Division of the Middle District of Georgia,

AHKIL NASIR CRUMPTON, a/k/a "CRUMP,"

defendant herein, did knowingly use, carry, and brandish a firearm, that is, one Glock 9mm caliber pistol, Model: 19, Serial Number: BPDV410, during and in relation to a crime of violence, as that term is defined in Title 18, United States Code, Section 924(c), for which the defendant may be prosecuted in a court of the United States, that is the crime of violence set forth in Count One of this Indictment, which is realleged and incorporated by reference herein, and, in the course of said conduct, caused the death of Elijah Wood, through the use of said firearm, and the killing was murder as defined in Title 18, United States Code, Section 1111, that is, the unlawful killing of a human being with malice aforethought; all in violation of Title 18, United States Code, Section 924(j)(1).

COUNT FOUR(False Statement During Purchase of a Firearm)

That on or about February 8, 2021, in the Athens Division of the Middle District of Georgia,

AHKIL NASIR CRUMPTON, a/k/a "CRUMP," and JAMES ARMSTRONG,

aided and abetted by one another, in connection with the acquisition of a firearm, that is, one Glock 9mm caliber pistol, Model: 19, Serial Number: BPDV410, from Kimberly's Jewelry, Inc. – Duncan and Company, d/b/a Franklin Gun Shop, located at 3941 Atlanta Highway, Athens, Georgia, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Kimberly's Jewelry, Inc. – Duncan and Company, d/b/a Franklin Gun Shop, which statement was intended and likely to deceive Kimberly's Jewelry, Inc. – Duncan and Company, d/b/a Franklin Gun Shop, as to a fact material to the lawfulness of such sale of the said firearm under Chapter 44 of Title 18, in that JAMES ARMSTRONG represented that he was the actual transferee/buyer of the firearm when in fact AHKIL NASIR CRUMPTON, a/k/a "CRUMP," was the actual transferee/buyer of the firearm; all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2) and Section 2.

A TRUE BILL.

s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

PETER D. LEARY UNITED STATES ATTORNEY

MICHAEL MORRISON
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this ______ day of ______, AD 2022

Deputy Clerk